

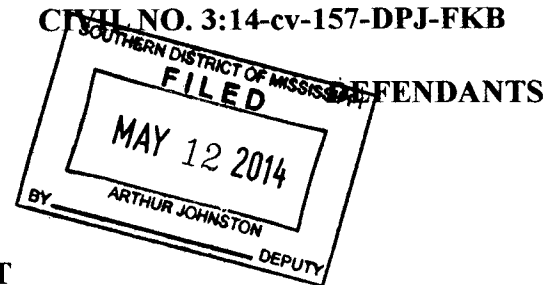
IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION

PATRICK L. KING & CATHY KING

PLAINTIFFS

V.

STATE OF MISSISSIPPI, et al.



MOTION
SUMMARY JUDGEMENT

Comes Now, Plaintiffs, Pro Se moves this Court for summary judgement against Defendants in above case. The RIAA, Clarion Ledger haven't sent any motions or responses back to Plaintiffs and Plaintiffs don't know if any motions have been filed with this Court by the Defendants.

Plaintiffs assert scienter against Defendants State Defendants, City of Hazlehurst, Copiah County, Channel 12 WJTV, Fox 40 WDBD, James Duff, and Channel 3 WLBT. Plaintiffs also ask for a summary judgement against these

Defendants in above style case. Plaintiffs also cite Pearson V. State, 428, So. 2D 1316 (1983)

To be sure, where it may be established that a conviction has been obtained through the use of false evidence or perjured testimony, the accused's rights secured by the due process clause of the Fourteenth Amendment of the Constitution of the United States are implicated. *Mooney v. Holohan*, 294 U.S. 103, 55 S.Ct. 340, 79 L.Ed. 791 (1935). And this is so without regard to whether the prosecution has wilfully procured the perjured testimony. Where such false evidence has in fact contributed to the conviction, the accused is entitled to relief therefrom. *Napue v. Illinois*, 360 U.S. 264, 79 S.Ct. 1173, 3 L.Ed.2d 1217 (1959); *Giglio v. United States*, 405 U.S. 150, 92 S.Ct. 763, 31 L.Ed.2d 104 (1972).

Plaintiffs also ask this Court for a Constitutional Challenge to statute 97-23-89 (a) governed under Rule 5.1 of the FRCP is this statute altered, constitutional, un-constitutional, or arbitrary since the Lower Court, Supreme Court of Mississippi, nor the Attorney General of the State of Mississippi want answer the question.

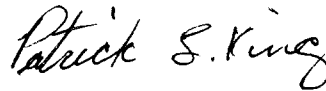
CONCLUSION

Plaintiffs, Pro Se has answered this Court to the best of their ability in the above style case and the Defendants state affirmative that they understand the latitude the Courts give Pro Se litigants, so

Defendants understand by using scienter what harm they have done to Plaintiffs.

Plaintiffs pray this Court grant them relief in the above style case.

Respectfully Submitted
Patrick King & Cathy King

A handwritten signature in black ink that reads "Patrick S. King". The signature is written in a cursive style with a large, stylized "P" and "K".

Date May 12, 2014

Patrick and Cathy King
207 Carlisle St.
Hazlehurst, MS. 39083
662-998-1507

CERTIFICATE OF SERVICE

Plaintiffs, Patrick King and Cathy King, Pro Se, have filed with the Clerk of this Court and have mailed USPS a copy to Phelps and Dunbar, Buttlar/Snow, and the AGO Civil Litigation Department.

Patrick King and Cathy King

Pro Se

Patrick S. King